

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

OCT 03 2022

UNITED STATES OF AMERICA

No. 3:22-00327

v.

18 U.S.C. § 2
18 U.S.C. § 241
18 U.S.C. § 248(a)(1)

[1] CHESTER GALLAGHER
[2] HEATHER IDONI
[3] CALVIN ZASTROW
[4] COLEMAN BOYD
[5] CAROLINE DAVIS
[6] PAUL VAUGHN
[7] DENNIS GREEN
[8] EVA EDL
[9] EVA ZASTROW
[10] JAMES ZASTROW
[11] PAUL PLACE

MOTION TO SEAL INDICTMENT

The United States of America, by and through Mark H. Wildasin, United States Attorney, and Amanda J. Klopf, Assistant United States Attorney, hereby moves this Court to seal the indictment in this case.

Seven of the defendants who are charged in the indictment returned today, are charged with: Conspiracy to injure, oppress, threaten, and intimidate patients and employees of the Clinic in the Middle District of Tennessee in the free exercise and enjoyment of the rights and privileges secured to them by the laws of the United States – namely, the right to obtain and seek to obtain, and to provide and seek to provide, reproductive health services, as provided by 18 U.S.C. § 248(c)(1), in violation go 18 U.S.C. § 241. All eleven defendants are charged with misdemeanor violation of the FACE Act, 18 U.S.C. § 248(a)(1) and 2.

The defendants are not in custody, and if the indictment is not sealed until such time as

they are arrested, they will pose a flight risk.

WHEREFORE, for the above reasons, the United States respectfully requests the indictment be sealed as described in the attached proposed Order.

Dated: October 3, 2022

Respectfully submitted,

MARK H. WILDASIN
United States Attorney
Middle District of Tennessee

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